

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

NRT TECHNOLOGY CORP. and	)	
NRT TECHNOLOGIES, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 19-804 MN-SRF
	)	
EVERI HOLDINGS INC. and	)	
EVERI PAYMENTS INC.,	)	
	)	
Defendants.	)	

**MOTION FOR TELECONFERENCE  
TO RESOLVE DISCOVERY DISPUTE**

Plaintiffs NRT Technology Corp. and NRT Technologies, Inc. respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

1. Whether Everi may refuse to apply NRT's 10 additional search terms to its custodial ESI under paragraph 5(b) of the Default Standard for Discovery, even after NRT twice narrowed its search terms in response to Everi's concerns.
2. Whether Everi may refuse to produce a metadata-only privilege log for its privileged communications with outside counsel, given the role played by counsel in Everi's scheme to use the '792 Patent to exclude NRT from the relevant market and in light of the fact that such a log can be produced with the click of a button.
3. Whether an extension of the deadline for the close of fact discovery is appropriate, given the intentional and obstructive delay on behalf of Everi and NRT's need for a reasonable amount of time to review Everi's documents and do follow-up discovery.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a telephonic meet and confer on the following date: June 10, 2021.

Delaware Counsel:

Christina B. Vavala for NRT; Adam W. Poff for Everi.

Lead Counsel:

Herbert Allen and Elizabeth Marden for NRT; Ashley Bass and Jeffrey Cao for Everi.

NRT is available for a teleconference on the following dates: July 7, 9, 12, and 14, 2021. NRT reached out to counsel for Everi on June 11, 16, and 17 to obtain Everi's availability for a teleconference. Despite these efforts, Everi has yet to provide NRT with any dates for its availability for such a teleconference.

Respectfully submitted,

**POLSINELLI PC**

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Dated: June 17, 2021

/s/ Christina B. Vavala

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